

July 1, 2003

Mr. George Zerniak USEPA Region 5 77 West Jackson Blvd. AE-17J Chicago, IL 60604-3507

Subject:

Exception Report for NESHAP, Ohio EPA ID P019 and L001

Dear Mr. Zerniak:

Morgan Electro Ceramics 3 month rolling average limit for halogenated solvent usage in degreasing operations is 30.6 lb/month/sq ft surface area. Ohio EPA ID# P019, a degreaser using perchloroethylene has exceeded this limit with 160.9 lb/month/sq ft surface area for the period of 04/01/2003 to 06/30/2003. The inherent reason for the exception was due to the unit developing a number of tank leaks. To correct this, a new unit has been purchased and will be installed during the facility shut down period 7/28/2003 to 8/8/2003.

Ohio EPA ID# L001, a degreaser using perchloroethylene has exceeded the 30.6 lb/month/sq ft surface area limit with a 75.9 lb/month/sq ft surface area for the period of 04/01/2003 to 06/30/2003. The inherent reason for this exception was due to the unit developing seal leaks in the heating section. Since this problem has occurred in the past, the manufacturer will be contacted for assistance on repairing the unit so that this problem does not continue.

Sincerely,

William J. Hocevar, P.E.

Facility Manager

JUL 0 8 2003

AIR ENFORCEMENT BRANCH, U.S. EPA, REGION 5

Facility Name:	Morgan	Electro Ceramics	EPA Facility ID: 1318031627		1318031627
Unit Name:	Finishin	g Equipment 6342		_	
Company I.D.:		VPD-24	Ohio I	EPA I.D.:[P019
Month:		April		Year:[2003
Unit Information					
Tank Length (inside):		2.92	(feet)		
Tank Width (inside):	•	1.50	(feet)		
Tank Surface Area (s.a.):	. [4.38	(feet) ²		•
Solvent Usage Information	•••••			For	mulas / Notes
1 Type Solvent Used		Perchloroethylene			
2 S.G. of Solvent		1.62		[F	rom MSDS]
3 Solvent Density		13.51	(lb/gallon)	[F	rom MSDS]
4 Solvent Added		51.0	(gallon)	[Fro:	n monthly log]
5 Waste Removed		0.0	(gallon)	[Fro	n monthly log]
6 % Solvent in waste		99.90%	(%)	. ~	analytical report]
7 Solvent Removed in	+	0.0	(gallon)	[gal. Wa	iste] * [% solvent]
8 Pure Solvent Remov	ed	0.0	(gallon)	[Fro	n monthly log]
9 Total Solvent Remov	red	0.0	(gallon)		[7+8]
·	r		· .		
10 Total Solvent Emitte	1	51.0	(gallon)		[4+9]
11 Total Solvent Emitte	d [689.1	(lbs)		[10 * 3]
Monthly Emissions					
Average Solvent					
Emission Rate:		157.3	(lb/month/	[11 / (t	ank surface area)
		1	ft ² s.a.)	[21, (6	
Average Solvent Allowable Rate:	-	30.6	-	From 40	CFR 63, Subpart T
Allowable Rate.				110111 40	CTR 03, Subpart 1
Note: If ave. solven	t emission	rate is < 30.6 lb/mo	ft^2 s.a.)	action is re	anired
If ave. solvent emiss			•		· 1
Three Month Rolling Average		> 50.0 10/111011111/1t ,	Note in qual	terry excee	chance report.
anice would roung Average					
3 - Month Average Solvent		•.			
Emission Rate:	Į	93.6	(lb/month/	[Average	of three previous
	i	2 2 2 2	ft^2 s.a.)		olvent emission rates

Facility Name: Unit Name: Company I.D.:	Morgan Electro Ceramics Finishing Equipment 6342 VPD-24		EPA I.D.: P019
Month:	May		Year: 2003
Unit Information Tank Length (inside): Tank Width (inside): Tank Surface Area (s.a.):	2.92 1.50 4.38	(feet) (feet) (feet) ²	
Solvent Usage Information			Formulas / Notes
1 Type Solvent Used	Perchloroethylene		
2 S.G. of Solvent	1.62		[From MSDS]
3 Solvent Density	13.51	(lb/gallon)	[From MSDS]
4 Solvent Added 5 Waste Removed 6 % Solvent in waste 7 Solvent Removed in 8 Pure Solvent Remov 9 Total Solvent Remov 10 Total Solvent Emitte 11 Total Solvent Emitte 11 Monthly Emissions	red 0.0 ved 0.0 ed 60.5	(gallon) (gallon) (%) (gallon) (gallon) (gallon) (gallon) (gallon)	[From monthly log] [From monthly log] [From analytical report] [gal. Waste] * [% solvent] [From monthly log] [7+8] [4+9] [10*3]
Average Solvent	H .		
Emission Rate:	186.6	(lb/month/	[11 / (tank surface area)]
Average Solvent Allowable Rate:	30.6	ft ² s.a.) [(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T
1	t emission rate is < 30.6 lb/mor		77.0
	sion rate is > 30.6 lb/month/ft ² ,	Note in qua	rterly exceedance report.
Three Month Rolling Averag	ge		
3 - Month Average Solvent Emission Rate:	155.8		[Average of three previous

ncility Name: mit Name: Finishing Equipment 6342 VPD-24			EPA Facility ID: 1318031627 Ohio EPA I.D.: P019	
Month:	June		Year: 2003	
Unit Information Tank Length (inside):	2.92	(feet)		
Tank Width (inside):	1.50	(feet)		
Tank Surface Area (s.a.):	4.38	(feet) ²		
Solvent Usage Information	Water State of the	200	Formulas / Notes	
1 Type Solvent Used	Perchloroethylene			
2 S.G. of Solvent	1.62		[From MSDS]	
3 Solvent Density	13.51	(lb/gallon)	[From MSDS]	
4 Solvent Added	45.0	(gallon)	[From monthly log]	
5 Waste Removed	0.0	(gallon)	[From monthly log]	
6 % Solvent in waste	99.90%	(%)	[From analytical report]	
7 Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]	
8 Pure Solvent Removed	0.0	(gallon)	[From monthly log]	
9 Total Solvent Removed	0.0	(gallon)	[7+8]	
a state plant and a state of the state of th				
10 Total Solvent Emitted	45.0	(gallon)	[4+9]	
11 Total Solvent Emitted	608.0	(lbs)	[10 * 3]	
Monthly Emissions				
Average Solvent				
Emission Rate:	138.8	(lb/month/	[11 / (tank surface area)]	
Average Solvent		ft ² s.a.)	-	
Allowable Rate:	30.6	(lb/month/	From 40 CFR 63, Subpart T	
2 4 2	3 0	ft ² s.a.)	2 ×	
Note: If ave. solvent emission	rate is < 30.6 lb/mon	th/ft2, NO	action is required.	
If ave. solvent emission rate is	> 30.6 lb/month/ft ² , 1	Note in quar	terly exceedance report.	
Three Month Rolling Average				
		6	0	
3 - Month Average Solvent		4		
Emission Rate:	160.9	(lb/month/	[Average of three previous	
		ft^2 sa)	months solvent emission rates	

	in Electro Ceramics Bakeslee MLR-280LE	EPA Fa	eility ID: 1318031627
Company I.D.:	VPD-34	Ohio l	EPA I.D.: £001
Month:	April		Year: 2003
Unit Information		1	
Tank Length (inside):	3.67	(feet)	" ± × *
Tank Width (inside):	2.67	(feet)	
Tank Surface Area (s.a.):	9.79	(feet) ²	
Solvent Usage Information		0	Formulas / Notes
1 Type Solvent Used	Perchloroethylene		
2 S.G. of Solvent	1.62		[From MSDS]
3 Solvent Density	13.51	(lb/gallon)	[From MSDS]
4 Solvent Added	24.0	(gallon)	[From monthly log]
5 Waste Removed	0.0	(gallon)	[From monthly log]
6 % Solvent in waste	99.90%	(%)	[From analytical report]
7 Solvent Removed in waste	0,0	(gallon)	[gal. Waste] * [% solvent]
8 Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9 Total Solvent Removed	0,0	(gallon)	[7+8]
	1		
10 Total Solvent Emitted	24.0	(gallon)	[4+9]
11 Total Solvent Emitted	324.3	(lbs)	[10 * 3]
n n n			
Monthly Emissions			***************************************
Average Solvent		1	
Emission Rate:	33.1	(lb/month/	[11 / (tank surface area)]
Average Solvent		ft ² s.a.)	
Allowable Rate:	30.6	(lb/month/	From 40 CFR 63, Subpart T
a 2 A =	e	ft ² s.a.)	# # # # # # # # # # # # # # # # # # #
Note: If ave. solvent emission	on rate is < 30.6 lb/mor	nth/ft2, NO	action is required.
If ave. solvent emission rate	is > 30.6 lb/month/ft ² ,	Note in quar	rterly exceedance report.
Three Month Rolling Average			_
	ii g		
3 - Month Average Solvent	p	7	6 5 8
Emission Rate:	20.7	J 1	[Average of three previous
) 10 a	ft ² s.a.)	months solvent emission rates

TO 20 20 20 20 20 20 20 20 20 20 20 20 20			* *
Facility Name:	Morgan Electro Ceramics	EPA Fa	ncility ID: 1318031627
The state of the s	iron Blakeslee MLR-280LE		Name of the Control o
Company I.D.:	VPD-34	Ohio 1	EPA I.D.: <i>L001</i>
Month:	May		Year: 2003
Unit Information			
Tank Length (inside):	3.67	(feet)	
Tank Width (inside):	2.67	(feet)	
Tank Surface Area (s.a.):	9.79	(feet)2-	
Solvent Usage Information			Formulas / Notes
1 Type Solvent Used	Perchloroethylene		TOTILIMING / LIVES
2 S.G. of Solvent	1.62		[From MSDS]
3 Solvent Density	13.51	(lb/gallon)	[From MSDS]
5 Borvoit Belisity		(ib/gailon)	
4 Solvent Added	65.0	(gallon)	[From monthly log]
5 Waste Removed	0.0	(gallon)	[From monthly log]
6 % Solvent in waste	99.90%	(%)	[From analytical report]
7 Solvent Removed in w	aste 0.0	(gallon)	[gal. Waste] * [% solvent]
8 Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9 Total Solvent Removed	i 0.0	(gallon)	[7+8]
10 Total Solvent Emitted	65.0	(gallon)	[4+9]
11 Total Solvent Emitted	878.2	Transfer Street Co.	[10 * 3]
	,		
Monthly Emissions			Land Land
Average Solvent	*		
Emission Rate:	89.7	(lb/month/	[11 / (tank surface area)]
Average Solvent		ft ² s.a.)	
Allowable Rate:	30.6	(lb/month/	From 40 CFR 63, Subpart T
		ft ² s.a.)	
Note: If ave. solvent e	mission rate is < 30.6 lb/mor		action is required.
	n rate is > 30.6 lb/month/ft ² ,		177
Three Month Rolling Average	, , , , , , , , , , , , , , , , , , , ,	1	, <u>1</u>
	/ 8		
3 - Month Average Solvent	a #/	_	
Emission Rate:	46.9	- 122 - 122	[Average of three previous
× 5		ft ² s.a.)	months solvent emission rate

Facility Name:	Morgan Electro Ceramics		EPA Facility ID: 1318031627		
Unit Name:	Baron Blakeslee MLR-280LE				
Company I.D.:	VPD-34	Ohio	EPA I.D.: £001		
Month:	June		Year: 2003		
Unit Information					
Tank Length (inside):	3.67	(feet)			
Tank Width (inside):	2.67	(feet)			
Tank Surface Area (s.a.):	9.79	(feet) ²			
Solvent Usage Information			Formulas / Notes		
1 Type Solvent Used	Perchloroethylene				
2 S.G. of Solvent	1.62		[From MSDS]		
3 Solvent Density	13.51	(lb/gallon)	[From MSDS]		
V	5 5				
4 Solvent Added	76.0	(gallon)	[From monthly log]		
5 Waste Removed	0.0	(gallon)	[From monthly log]		
6 % Solvent in waste	99.90%	(%)	[From analytical report]		
7 Solvent Removed in	waste 0.0	(gallon)	[gal. Waste] * [% solvent]		
8 Pure Solvent Remov	ed 0.0	(gallon)	[From monthly log]		
9 Total Solvent Remove	ved 0.0	(gallon)	[7+8]		
* *					
10 Total Solvent Emitte	d 76.0	(gallon)	[4+9]		
11 Total Solvent Emitte	d 1026.8	(lbs)	[10 * 3]		
			2		
Monthly Emissions		-	* 9		
Average Solvent			a •		
Emission Rate:	104.9	(lb/month/	[11 / (tank surface area)]		
Average Solvent	Read Televisyahan soomaan muhampian demaga pit mit kallusikan kiri sila salas sila sila sila sila sila si	ft ² s.a.)			
Allowable Rate:	30.6	(lb/month/	From 40 CFR 63, Subpart T		
	3)	ft ² s.a.)			
Note: If ave. solvent	emission rate is < 30.6 lb/mon		action is required		
	on rate is > 30.6 lb/month/ft ² , 1				
Three Month Rolling Average		10te III qual	terry exceedance report.		
3 - Month Average Solvent	N N N N N N N N N N N N N N N N N N N				
Emission Rate:	75.9	(lb/month/	Average of three previous		
		ft ² s.a.)	months solvent emission rates		